



EX PARTE OR LATE FILED

James K. Smith
Director
Federal Relations

June 22, 1999

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Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals
445 12th Street, SW
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: **Ex Parte Statement**
CC Docket 99-35, Local Number Portability

Dear Ms. Salas:

Numerous discussions have been had with Commission staff in this proceeding and ex parte statements were filed on May 11, 1999, June 3, 1999, June 4, 1999, June 9, 1999 and June 11, 1999.

The attached letter is also to be included in the record of this proceeding.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jane Jackson".

cc: Jane Jackson
Kris Monteith
Chris Barnekov

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June 18, 1999

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**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

Jane Jackson
Chief, Competitive Pricing Division
Federal Communications Commission
445 12th Street, S.W. (Fifth Floor)
Washington, D.C. 20554

Re: CC Docket No. 99-35, Local Number Portability

Ameritech has conducted numerous discussions with the Commission staff regarding Ameritech's Long Term Number Portability (LNP) filing and the SS7 related costs attributable to LNP which it will incur within the five year LNP cost recovery period. Throughout these discussions, Ameritech has maintained that at this point, it cannot project its actual SS7 costs attributable to LNP to the end of the five year period, but is certain that additional costs will be incurred.

As a consequence, Ameritech has recently begun an initiative to review its SS7 based LNP network and determine ways to improve the reliability of that network. While this type of a review is not atypical after the introduction and evolution of a new service offering, a few recent problems with Ameritech's LNP network make this review even more timely. The purpose of the review is to evaluate Ameritech's end-to-end process for provisioning and maintaining its LNP offering. The goal of the review is to not only to develop ways to improve the reliability of Ameritech's LNP network, but also to improve the responsiveness and accountability of the Ameritech personnel responsible for provisioning and maintaining its LNP offering. A key component of the review will be to analyze Ameritech's LNP architecture to determine ways to increase the stability of Ameritech's LNP platform and its SS7 network.

Although this review is just beginning, there is a strong likelihood that one result of this review will be the identification of additional SS7 facilities that will be added during the five year recovery period to support LNP, and whose costs are properly attributable to LNP in accordance with the Commission's and the Common Carrier Bureau's orders on cost recovery. Due to the complexity and broad scope of this review, as described above, and because the review plan is still being formulated, it is expected that this review will be completed within 60 days and the total amount of these additional LNP related costs will be known at that time.

Ameritech requests that the Commission take into consideration Ameritech's internal review of its LNP platform, and specifically its impact on Ameritech's SS7 network, in reaching a decision in the Commission's current LNP cost recovery investigation.

Sincerely,

A handwritten signature in cursive script, reading "Michael B. Sullivan".

cc: Kris Monteith
Chris Barnekov